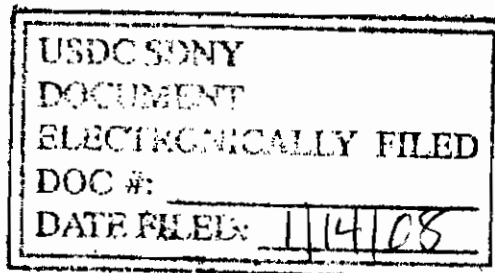


MEMO ENDORSED

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January 14, 2008

BY FACSIMILE

The Honorable James C. Francis IV
United States Magistrate Judge, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1960
New York, New York 10007-1312

Re: Schiller, et al., v. City of N.Y., et al. 04 CV 7922 (RJS) (JCF)
Dinler, et al., v. City of N.Y., et al. 04 CV 7921 (RJS) (JCF)
RNC Consolidated Cases (RJS) (JCF)

*Docket in
all related
cases*

Dear Judge Francis:

Defendants write to request a one week extension of time in which to comply with the terms of Your Honor's November 26, 2007 Order.¹ Defense counsel has already completed a substantial amount of work in putting together a motion relating to the plaintiffs' depositions. As Your Honor is aware, over 500 plaintiffs have been deposed and the review of their transcripts and individual discovery responses has been an extensive and time consuming project.² Consolidating the various discovery issues raised in each case, by each plaintiff into an efficient and workable format to present to the Court requires a massive coordinated effort. Similarly, coordinating notices of deposition for the relevant non-party witnesses identified in each of the 500+ plaintiff depositions is also a massive project. Due to the time pressure, defense counsel has not had the opportunity to garner the consent of plaintiffs' counsel.

¹ A copy of Your Honor's November 26, 2007 Order is attached as Ex. A.

² Significantly, some of the plaintiff deposition transcripts have only recently been received.

Accordingly, defendants request one additional week in which to comply with the deadlines imposed by the November 26, 2007 Order, which would require submission of motions and service of non-party deposition notices on or before January 22, 2008.

Respectfully submitted,

Jeffrey A. Dougherty
Jeffrey A. Dougherty

cc: All RNC Counsel (via Email Distribution List)

1/14/08
Application granted. No
further extensions. Any
motion filed without
compliance with the
meet & confer requirement
will be summarily denied.

SO ORDERED.
James C. Francis IV
OSMJS